

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,  
*et al.*,<sup>1</sup>

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of  
the Woodbridge Liquidation Trust, successor in  
interest to the estates of WOODBIDGE GROUP OF  
COMPANIES, LLC, *et al.*,

Plaintiff,

vs.

IRA SERVICES TRUST COMPANY, CUSTODIAN  
FOR THE BENEFIT OF SHUANG HUO IRA;  
SHUANG HUO,

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding

Case No. 19-50592 (BLS)

**PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT JUDGMENT**

Plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust (the “Plaintiff”) has requested entry of default against defendants IRA Services Trust Company, custodian for the benefit of Shuang Huo IRA, and Shuang Huo (each a “Defendant,” and collectively, the “Defendants”) in the above-captioned adversary proceeding.

Plaintiff requests that a default judgment in the amount of \$105,080.33 plus \$350.00 in Court costs be entered based on (a) the Entry of Default against Defendant, (b) the details of the Affidavit of Counsel in Support of Plaintiff’s Request for Entry of Default (the “Affidavit”), and (c) the Complaint for Avoidance and Recovery of Fraudulent Transfers Pursuant to 11 U.S.C.

---

<sup>1</sup> The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

Sections 544, 548, & 550, with the accompanying Summons and Certificate of Service, attached to the Affidavit as Exhibit A. A form of Entry of Default Judgment is attached hereto as **Exhibit A.**

PACHULSKI, STANG, ZIEHL & JONES LLP

Dated: February 4, 2021

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142)

Andrew W. Caine (CA Bar No. 110345)

Colin R. Robinson (DE Bar No. 5524)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: bsandler@pszjlaw.com

acaine@pszjlaw.com

crobinson@pszjlaw.com

*Counsel to Plaintiff Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust*